

**EXHIBIT 6**

**FILED UNDER SEAL**

HENRY MIROLYUZ - 01/11/2019

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MINNESOTA

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FAIR ISAAC CORPORATION, a X  
Deleware corporation

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Plaintiff(s)

8

-vs-

X

CASE NO. 16-cv-1054  
(WMW/DTS)

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FEDERAL INSURANCE COMPANY, an  
Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation

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X

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Defendant(s)

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DEPOSITION OF HENRY MIROLYUZ

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DATE: JANUARY 11, 2019

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HELD AT:

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HUSEBY - CONNECTICUT  
249 Pearl Street  
Hartford, Connecticut

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Dawn C. Mahoney, LSR #142

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<p style="text-align: right;">Page 22</p> <p>1 A We don't know.</p> <p>2 Q This is an exhibit from your earlier</p> <p>3 deposition when we talked about installations in the</p> <p>4 UK. As you see, the document comes – it's from</p> <p>5 yourself to Richard Johnson and others.</p> <p>6 Can you confirm for me that as of this date</p> <p>7 this document reports that Blaze Advisor 6.7 is being</p> <p>8 used in Europe?</p> <p>9 A It does not confirm that it was used. All</p> <p>10 it confirm is that I provide the information where</p> <p>11 they can – if they choose so to download the</p> <p>12 software. But it does not confirm that it was used.</p> <p>13 Q All right. SO if at this time they were to</p> <p>14 download Blaze Advisor from that internal site of</p> <p>15 CHUBB, it would be version 6.7 that would be</p> <p>16 downloaded?</p> <p>17 A Correct.</p> <p>18 (Plaintiff's Exhibit 185 marked for</p> <p>19 identification.)</p> <p>20 Q I'm showing you – you have Exhibit 185, an</p> <p>21 e-mail dated May 25, 2010. Dean Lawton, is he from</p> <p>22 Europe?</p> <p>23 A According to the e-mail heading, yes, he is.</p> <p>24 Q Okay. And are all of the recipients from</p> <p>25 Europe, according to the header?</p>	<p style="text-align: right;">Page 24</p> <p>1 insurance to their customers?</p> <p>2 A It's primarily – to my knowledge, it's</p> <p>3 primarily used by the internal staff, basic</p> <p>4 information provided by brokers and agents. Of</p> <p>5 course, there could be exception to that rule. But as</p> <p>6 a general rule, it's for the internal staff.</p> <p>7 Q All right. So then based upon information</p> <p>8 provided by the brokers and agents, the policy</p> <p>9 administration system then responds to the broker and</p> <p>10 agent with the proposed solution or the proposed</p> <p>11 policy and a quote for that policy?</p> <p>12 A Correct. And if they accept it, they book,</p> <p>13 bind and issue the policy.</p> <p>14 Q And then if the agent accepts the – or the</p> <p>15 customer accepts the policy, the agent then does</p> <p>16 something – provides information, and as a</p> <p>17 consequence, the policy administration system presents</p> <p>18 to the agent the information that binds – the</p> <p>19 customer has a binding insurance policy and it's</p> <p>20 booked and the deal is done, correct?</p> <p>21 (Plaintiff's Exhibit 186 marked for</p> <p>22 identification.)</p> <p>23 Q Now you have Exhibit 186. This is an</p> <p>24 e-mail. I acknowledge that you are not showing on the</p> <p>25 chain. Could you identify John Samese, please?</p>
<p style="text-align: right;">Page 23</p> <p>1 A That is correct.</p> <p>2 Q And then the carbon copy is Ewen Setti.</p> <p>3 He's European, he's from London as well?</p> <p>4 A Yes. Yes, he is.</p> <p>5 Q Okay. Do you know what the application</p> <p>6 Adapt/Adapt BE is?</p> <p>7 A To my knowledge, it's a policy</p> <p>8 administration system for the, I believe, ABL line of</p> <p>9 business.</p> <p>10 Q What is the ABL line of business?</p> <p>11 A I do not – I do not recall. It's accident</p> <p>12 and death, I believe, benefits. But that's my</p> <p>13 assumption.</p> <p>14 Q And would you give us the meaning of a</p> <p>15 policy administration system?</p> <p>16 A It's an application which allows to book,</p> <p>17 bind and issue policies – insurance policies for the</p> <p>18 specific line of business.</p> <p>19 Q Do brokers and agents use it?</p> <p>20 A Sometimes. I'm not sure about this</p> <p>21 particular case.</p> <p>22 Q Okay. I guess let's just talk about policy</p> <p>23 administration systems in general and your knowledge</p> <p>24 about that. As a general statement, brokers and</p> <p>25 agents use policy administration systems to sell</p>	<p style="text-align: right;">Page 25</p> <p>1 A He is the architect at CHUBB IT. He was at</p> <p>2 that time. He was an architect at CHUBB IT.</p> <p>3 Q CHUBB where?</p> <p>4 A CHUBB IT.</p> <p>5 Q CHUBB IT. In the U.S.?</p> <p>6 A In the U.S.</p> <p>7 Q And Patrick Sullivan, as you said, was chief</p> <p>8 architect?</p> <p>9 A Chief architect.</p> <p>10 Q In the U.S.?</p> <p>11 A Correct.</p> <p>12 Q And then the subject matter of the</p> <p>13 attachment is Blaze Platform Application Usage Matrix.</p> <p>14 If we look at the last page – I'm asking for your</p> <p>15 interpretation of the last page.</p> <p>16 MR. FLEMING: Literally, the last page</p> <p>17 that I have is this; it has two words on it.</p> <p>18 MR. HINDERAKER: How about the second</p> <p>19 to the last page?</p> <p>20 Q So it starts off with "SBU" as the column</p> <p>21 header?</p> <p>22 A Correct.</p> <p>23 Q That means business unit?</p> <p>24 A Correct.</p> <p>25 Q Do you know what "S" stands for?</p>

<p style="text-align: right;">Page 30</p> <p>1 Q Which CHUBB employees?</p> <p>2 A I spoke in the past with –</p> <p>3 MR. FLEMING: Objection; asked and</p> <p>4 answered at the last deposition.</p> <p>5 MR. HINDERAKER: Go ahead.</p> <p>6 THE WITNESS: I spoke with Miranda</p> <p>7 Chang, I spoke with Ramesh Pandey, and I spoke –</p> <p>8 as part of the people that I can remember – and</p> <p>9 I spoke with Zorica Todorovic.</p> <p>10 Q Did you speak with anybody – that was in</p> <p>11 the past. Did you speak with anybody to prepare</p> <p>12 yourself for your testimony on Topic 15 today?</p> <p>13 A I spoke with Zorica Todorovic to prepare on</p> <p>14 topic today.</p> <p>15 Q So spoke with that person again?</p> <p>16 A Yes.</p> <p>17 Q Anyone else?</p> <p>18 A No.</p> <p>19 Q Based upon that, can you identify any person</p> <p>20 from FICO that assisted in the installation of Blaze</p> <p>21 Advisor in the UK?</p> <p>22 MR. FLEMING: Objection; asked and</p> <p>23 answered in the last deposition.</p> <p>24 MR. HINDERAKER: Go ahead.</p> <p>25 THE WITNESS: I cannot identify those.</p>	<p style="text-align: right;">Page 32</p> <p>1 A I believe I did.</p> <p>2 Q You believe you did?</p> <p>3 A Yes.</p> <p>4 Q Do you recall when?</p> <p>5 A I don't recall the exact date.</p> <p>6 Q Same questions with respect to installations</p> <p>7 in Canada.</p> <p>8 A Again, I did – yes, I did. And I do not</p> <p>9 recall the exact date.</p> <p>10 Q So again, there's no individual person at</p> <p>11 FICO that you know of that assisted in the</p> <p>12 installation?</p> <p>13 A No.</p> <p>14 Q To your knowledge, who do you – did anybody</p> <p>15 tell you – as opposed to your assumptions, did</p> <p>16 anybody tell you that Canadian CHUBB representatives</p> <p>17 placed tickets at the help desk?</p> <p>18 A My conversations in the past with Tony Zahn,</p> <p>19 who was the architect for the Canadian zone, that they</p> <p>20 opened the ticket.</p> <p>21 Q Okay. The same question with respect to</p> <p>22 Australia.</p> <p>23 A I did not work with Australia or was not</p> <p>24 engaged by anybody in Australia regarding the use of</p> <p>25 Blaze.</p>
<p style="text-align: right;">Page 31</p> <p>1 They dealt with the help desk support and they</p> <p>2 would raise the tickets. So they did not – that</p> <p>3 worked generically as FICO. Mike Sawyer would be</p> <p>4 the contact person for me in case any additional</p> <p>5 assistance would be needed.</p> <p>6 Q Do you recall yourself contacting or</p> <p>7 engaging Mike Sawyer and yourself?</p> <p>8 A I did.</p> <p>9 Q And when was that?</p> <p>10 A That's during the – between 2010 and 2014</p> <p>11 if my memory serves me correctly.</p> <p>12 Q Okay. Tell me about your contacts with Mike</p> <p>13 Sawyer.</p> <p>14 A I got informed by developers that there was</p> <p>15 an issue and they need to be resolved quickly. So I</p> <p>16 would just make him aware. Because as a client</p> <p>17 representative of FICO, he has an influence to</p> <p>18 expedite the request to go to the help desk.</p> <p>19 Q Is it fair to say that you advised Mike</p> <p>20 Sawyer making him aware that people in the UK were</p> <p>21 reaching out to the help desk for help?</p> <p>22 A Correct. In the UK or U.S. That was normal</p> <p>23 part of my working relationship with him.</p> <p>24 Q Do you recall specifically reaching out to</p> <p>25 Mike Sawyer specific to install issues in the UK?</p>	<p style="text-align: right;">Page 33</p> <p>1 Q Okay. So you don't know the answer to that</p> <p>2 one way or the other?</p> <p>3 A I don't, yeah.</p> <p>4 Q Your understanding after speaking with these</p> <p>5 people, let me see if it I have clear, is that CHUBB</p> <p>6 representatives in the UK, CHUBB representatives in</p> <p>7 Canada use the internal CHUBB website to download</p> <p>8 Blaze Advisor on their respective servers?</p> <p>9 A Not correct. Not to the respective desktop</p> <p>10 or laptops or virtual machines.</p> <p>11 Q All right. To download Blaze Advisor</p> <p>12 software on their respective laptops or their</p> <p>13 respective servers, whichever –</p> <p>14 A We do not download software from the website</p> <p>15 to the server. It would always be downloaded to the</p> <p>16 personal workstation.</p> <p>17 Q And then how does it get to the servers?</p> <p>18 Let's say that CHUBB has servers in Toronto. How does</p> <p>19 it get to those servers?</p> <p>20 A Blaze itself is never installed on the</p> <p>21 server. It gets deployed as part of the application.</p> <p>22 Q Let's just take an application that's</p> <p>23 running to support the insurance sales in Europe.</p> <p>24 Let's call the application Evolution.</p> <p>25 A Correct.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q Blaze Advisor is downloaded on what in the</p> <p>2 UK?</p> <p>3 A It will get downloaded to the developer's</p> <p>4 workstation.</p> <p>5 Q Okay. And then the developer -- and his</p> <p>6 workstation will develop the Evolution application?</p> <p>7 A Correct.</p> <p>8 Q And then when somebody in Europe, anybody in</p> <p>9 Europe, is using the Evolution application, whether</p> <p>10 CHUBB or broker or agent, that application is -- where</p> <p>11 is the Blaze Advisor software on which that</p> <p>12 application is running hosted?</p> <p>13 A Blaze Advisor software gets packaged as a</p> <p>14 part of the application and deployed to the server,</p> <p>15 whatever the team -- specific IT team decided to</p> <p>16 deploy. Location of the server being known only to</p> <p>17 the team itself.</p> <p>18 Q Could you say that again?</p> <p>19 MR. FLEMING: Could you read the</p> <p>20 answer.</p> <p>21 (The requested testimony was read back</p> <p>22 by the court reporter.)</p> <p>23 Q Is it accurate to say that the Blaze Advisor</p> <p>24 software is -- I'm sorry. Is it accurate to say that</p> <p>25 the application includes the Blaze Advisor software?</p>	<p style="text-align: right;">Page 36</p> <p>1 are hosted?</p> <p>2 A It was -- for the Canada it was hosted on</p> <p>3 the U.S. servers.</p> <p>4 Q All right. But before you told us that in</p> <p>5 Canada applications were being migrated to North</p> <p>6 Carolina?</p> <p>7 A Yes, it was my mistake. That was my</p> <p>8 original deposition. Based on my recent conversation</p> <p>9 with Zorica, I got ahold of the more correct</p> <p>10 information.</p> <p>11 Q So is your testimony today that there has</p> <p>12 never been a migration to the United States from</p> <p>13 Canada?</p> <p>14 A To my knowledge -- I'm not sure. I cannot</p> <p>15 speak if it was migration or not. I know that the</p> <p>16 application, per her statement -- per my conversation</p> <p>17 with Zorica, application is hosted and was hosted on</p> <p>18 the U.S. server in the time Blaze was developed.</p> <p>19 Q And then computers in Canada are running the</p> <p>20 application?</p> <p>21 A It's computers -- again, computers running</p> <p>22 Blaze software are also hosted the United States.</p> <p>23 Q To your knowledge, the testimony that you're</p> <p>24 giving today is that the Blaze Advisor software</p> <p>25 applications have not been migrated from Canada to the</p>
<p style="text-align: right;">Page 35</p> <p>1 A Correct.</p> <p>2 Q Okay. So the application that is being run</p> <p>3 to support the sale of insurance in Europe is on</p> <p>4 computers in Europe?</p> <p>5 A No, it is not. It is in the computers used</p> <p>6 by people in Europe, but computers could be located in</p> <p>7 the United States or any other geographical region.</p> <p>8 Q Do you know one way or the other whether the</p> <p>9 applications running in Europe were -- the Blaze</p> <p>10 Advisor applications running in Europe were hosted on</p> <p>11 computers in Europe?</p> <p>12 A I don't know one way or another.</p> <p>13 Q Not one way or the other?</p> <p>14 A Never interested me.</p> <p>15 (Court reporter asked for</p> <p>16 clarification.</p> <p>17 A It never interested me. It was not part of</p> <p>18 the my duties.</p> <p>19 Q So then with respect to applications that</p> <p>20 support the sale of insurance in Canada, the Blaze</p> <p>21 Advisor -- the applications include the Blaze Advisor</p> <p>22 software?</p> <p>23 A Correct.</p> <p>24 Q Do you know one way or the other where the</p> <p>25 applications that include the Blaze Advisor software</p>	<p style="text-align: right;">Page 37</p> <p>1 United States?</p> <p>2 A Blaze Advisor -- to my knowledge, Blaze</p> <p>3 Advisor was not -- application running Blaze Advisor</p> <p>4 was not. It could have been migrated before, but the</p> <p>5 Blaze Advisor software and the application using the</p> <p>6 Blaze Advisor was hosted in the United States.</p> <p>7 Q Always?</p> <p>8 A To my knowledge, yes.</p> <p>9 MR. FLEMING: We've been going about an</p> <p>10 hour. When you get to the end of a topic, can we</p> <p>11 take a break?</p> <p>12 MR. HINDERAKER: Sure. Now is fine.</p> <p>13 THE VIDEOGRAPHER: We're going off</p> <p>14 record. The time would be approximately at 9:56.</p> <p>15 (Recess taken from 9:56 to 10:09)</p> <p>16 THE VIDEOGRAPHER: We are back on</p> <p>17 record. The time is approximately 10:09. You</p> <p>18 may continue.</p> <p>19 Q (By Mr. Hinderaker) Welcome back.</p> <p>20 A Thank you.</p> <p>21 Q What caused you to change your testimony</p> <p>22 regarding the fact of Blaze Advisor software being</p> <p>23 hosted on servers in Canada?</p> <p>24 MR. FLEMING: I'll object. It's</p> <p>25 argumentative.</p>